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Attorneys for Defendant Alex Oladele

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RESEAU DOCTEUR, INC., a Delaware
Corporation,
Plaintiff,

v.

ALEX OLADELE, an individual,

Defendant.

Case No.: 2:21-cv-01795-GMN-VCF

**STIPULATION AND [PROPOSED]
ORDER TO TRANSFER VENUE TO
UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF
GEORGIA**

Pursuant to 28 U.S.C. § 1404(a), Defendant Alex Oladele ("Mr. Oladele"), by and through his counsel of record, the law firms of Peterson Baker, PLLC and Walker & Associates LLC, and Plaintiff Réseau Docteur, Inc., ("RDI"), by and through its counsel of record, the law firm of Greenspoon Marder LLP, hereby consent to and jointly seek an Order transferring this action to the United States District Court for the Northern District of Georgia. In support thereof, Mr. Oladele and RDI state as follows:

1. RDI filed its Complaint [ECF No. 1] ("Complaint") against Mr. Oladele on September 28, 2021.

2. Copies of the Summons and the Complaint were served on Mr. Oladele in Atlanta, Georgia on October 25, 2021. (*See* Affidavit of Service [ECF No. 11].)

3. Pursuant to the Court's Order [ECF No. 14] approving the parties' stipulation dated November 16, 2021 [ECF No. 12], Mr. Oladele was granted an extension of time to and including December 3, 2021, to file and serve his answer or other response to the Complaint.

4. Pursuant to 28 U.S.C. § 1404(a), the Court may, "[f]or the convenience of parties and witnesses" and "in the interest of justice", transfer this action to any other district "where it might have been brought or to any district or division to which all parties have consented."

5. Counsel for Mr. Oladele and RDI have met and conferred regarding transferring this action to the United States District Court for the Northern District of Georgia.

6. Mr. Oladele and RDI agree this action could have been filed in the United States District Court for the Northern District of Georgia.

7. Mr. Oladele and RDI consent to the transfer of this action to the United States District Court for the Northern District of Georgia for the convenience of the parties and witnesses and in the interest of justice.

8. Mr. Oladele and RDI respectfully request that an Order be entered pursuant to 28 U.S.C. § 1404(a) transferring this action from the United States District Court, District of Nevada to the United States District Court for the Northern District of Georgia.

9. Nothing in this Stipulation modifies the deadlines agreed to by the parties and approved in the Court's Order [ECF No. 14].

10. Should the Court approve this Stipulation, Mr. Oladele and RDI shall bear their own attorneys' fees related to the transfer of venue; however, Mr. Oladele and RDI agree to equally share in any filing fees that may be required by the transfer.

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11. This Stipulation is not for the purpose of delay and does not prejudice any party.

Respectfully submitted this 29th day of November, 2021.

PETERSON BAKER, PLLC

GREENSPOON MARDER LLP

By: /s/ Nikki L. Baker

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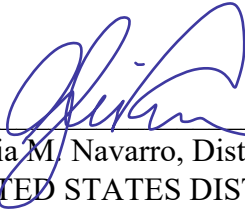
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Attorneys for Plaintiff Réseau Docteur, Inc.

IT IS SO ORDERED.

December

Dated this 1 day of [REDACTED], 2021.


12/1/21
Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT

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